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 and AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

AMAZON.COM, INC., a Delaware  
 corporation, and AMAZON TECHNOLOGIES,  
 INC., a Nevada corporation,

Plaintiffs,

v.

UMER WASIM, *et al.*,

Defendants.

Case No. 3:23-cv-05580-TLT

**[PROPOSED] ORDER GRANTING  
 PLAINTIFFS AMAZON.COM, INC. &  
 AMAZON TECHNOLOGIES, INC.'S  
 NOTICE OF MOTION AND MOTION  
 FOR DEFAULT JUDGMENT AGAINST  
 DEFENDANTS (1) VTLOGODESIGN,  
 INC.; (2) MK AFFILIATES, INC.; (3) ALI  
 ALAM; (4) DYNAMIC DIGITAL  
 SOLUTIONS LLC; (5) MEHWASH  
 MUNIR; (6) ONE STOP COMPUTER  
 SERVICES LLC; (7) MUHAMMAD  
 ZUBAIR KHAN; (8) TECHTURE INC.; (9)  
 MUHAMMAD MUDASSAR ANWAR; (10)  
 TECH DRIVE PVT LLC; (11) ASHHAR  
 RAWOOF; (12) SMART STARTUP  
 SOLUTIONS; (13) MUHAMMAD USMAN  
 KHAN; (14) YASIR AGAR; (15)  
 MUHAMMAD SHIRAZ QURESHI; AND  
 (16) MAVIA NIZAM**

**Hearing Date: December 10, 2024  
 Time: 2:00 pm  
 Location: San Francisco  
 Courtroom 09  
 19th Floor**

Complaint filed: October 30, 2023

Presently before the Court is a Motion for Default Judgment (“Motion”) by Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc. (collectively, “Amazon”), against Defendants: (1) VTLogodesign, Inc.; (2) MK Affiliates, Inc.; (3) Ali Alam; (4) Dynamic Digital Solutions LLC; (5) Mehwash Munir; (6) One Stop Computer Services LLC; (7) Muhammad Zubair Khan; (8) Techtur Inc.; (9) Muhammad Mudassar Anwar; (10) Tech Drive Pvt LLC; (11) Ashhar Rawoof; (12) Smart Startup Solutions, LLC.; (13) Muhammad Usman Khan; (14) Yasir Agar; (15) Muhammad Shiraz Qureshi; and (16) Mavia Nizam (“Defendants”). Pursuant to Federal Rule of Civil Procedure 55(b), the Court GRANTS the Motion, and enters JUDGMENT as follows, on: (a) Amazon Technologies, Inc.’s First Cause of Action for Trademark Infringement (15 U.S.C. § 1114); (b) Amazon’s Second Cause of Action for False Affiliation and Designation of Origin (15 U.S.C. § 1125(a)); (d) Amazon Technologies, Inc.’s Third Cause of Action for Trademark Dilution (15 U.S.C. § 1125(c)); and (c) Amazon’s Technologies, Inc.’s Fourth Cause of Action for Cybersquatting (15 U.S.C. § 1125(d)).

#### **Statutory Damages**

The Court awards statutory damages for Defendants’ willful violations of the Lanham Act as follows:

1. \$2,500,000.00 from Defendant Muhammad Usman Khan for willful infringement of the Amazon Marks 1-3, 6, and 8. 15 U.S.C. § 1117(c).
2. \$2,500,000.00 from Defendant VTLogoDesign, Inc. for willful infringement of the Amazon Marks 1-3, 6, and 7. 15 U.S.C. § 1117(c).
3. \$2,500,000.00 from Defendant MK Affiliates, Inc. for willful infringement of the Amazon Marks 1-3, 6, and 7. 15 U.S.C. § 1117(c).
4. \$2,500,000.00 from Defendant Ali Alam for willful infringement of the Amazon Marks 1-3, 6, and 8. 15 U.S.C. § 1117(c).
5. \$300,000.00 from Defendant Ali Alam for cybersquatting in connection with the domain names: Amzdigitalpro.com, amazonpublisherpro.com, and amazonkdpublishing.com. 15 U.S.C. § 1117(d).

1           6.       \$2,000,000.00 from Defendant Dynamic Digital Solutions LLC for willful  
2 infringement of the Amazon Marks 1, 3, 6, and 8. 15 U.S.C. § 1117(c).

3           7.       \$2,500,000.00 from Defendant Mehwash Munir for willful infringement of the  
4 Amazon Marks 1-3, 6, and 8. 15 U.S.C. § 1117(c).

5           8.       \$2,500,000.00 from Defendant One Stop Computer Services LLC for willful  
6 infringement of the Amazon Marks 1-3, 6, and 8. 15 U.S.C. § 1117(c).

7           9.       \$2,000,000.00 from Defendant Muhammad Zubair Khan for willful infringement  
8 of the Amazon Marks 1, 3, 6, and 8. 15 U.S.C. § 1117(c).

9           10.      \$200,000.00 from Defendant Muhammad Zubair Khan for cybersquatting in  
10 connection with the domain names: Amazonpublishers.ca and amazonbookhub.com. 15 U.S.C.  
11 § 1117(d).

12          11.      \$2,000,000.00 from Defendant Techtire Inc. for willful infringement of the  
13 Amazon Marks 1, 3, 6, and 8. 15 U.S.C. § 1117(c).

14          12.      \$1,500,000.00 from Defendant Muhammad Mudassar Anwar for willful  
15 infringement of the Amazon Marks 1, 2, and 3. 15 U.S.C. § 1117(c).

16          13.      \$1,500,000.00 from Defendant Tech Drive PVT LLC for willful infringement of  
17 the Amazon Marks 1, 2, and 3. 15 U.S.C. § 1117(c).

18          14.      \$300,000.00 from Defendant Tech Drive PVT LLC for cybersquatting in  
19 connection with the domain names: Amazonpublishingsol.com, amazonpublishingpartner.com  
20 and amazonprofessionalpublishers.com. 15 U.S.C. § 1117(d).

21          15.      \$2,500,000.00 from Defendant Ashhar Rawoof for willful infringement of the  
22 Amazon Marks 1-3, 6, and 8. 15 U.S.C. § 1117(c).

23          16.      \$100,000.00 from Defendant Ashhar Rawoof for cybersquatting in connection  
24 with the domain names: Amazonkindledirectpublishing.com. 15 U.S.C. § 1117(d).

25          17.      \$2,000,000.00 from Defendant Smart Startup Solutions, LLC for willful  
26 infringement of the Amazon Marks 1, 3, 6, and 8. 15 U.S.C. § 1117(c).

27          18.      \$2,000,000.00 from Defendant Yasir Agar for willful infringement of the Amazon  
28 Marks 1, 3, 6 and 8. 15 U.S.C. § 1117(c).

19. \$400,000.00 from Defendant Yasir Agar for cybersquatting in connection with the domain names: Amazonprofinc.com, amazonkindlebookpublishing.com, amazonkindleproinc.com and amazonkdpublishers.com. 15 U.S.C. § 1117(d).

20. \$2,000,000.00 from Defendant Mavia Nizam for willful infringement of the Amazon Marks 1-3 and 6. 15 U.S.C. § 1117(c).

21. \$500,000.00 from Defendant Mavia Nizam for cybersquatting in connection with the domain names: Amazondigitalpro.com, amzdigitalpro.com, amazonpublisherpro.com, amazonpublishingzone.com, and amazonkdppublication.com. 15 U.S.C. § 1117(d).

22. \$2,000,000.00 from Defendant Muhammad Shiraz Qureshi for willful infringement of the Amazon Marks 1, 3, and 6. 15 U.S.C. § 1117(c).

23. \$100,000.00 from Defendant Muhammad Shiraz Qureshi for cybersquatting in connection with the domain names: Amzkindlepublishing.com. 15 U.S.C. § 1117(d).

24. Interest from the date of entry of this judgment shall accrue at the legal rate. *See* 28 U.S.C. § 1961.

### **Permanent Injunction**

Defendants (1) VTLogodesign, Inc.; (2) MK Affiliates, Inc.; (3) Ali Alam; (4) Dynamic Digital Solutions LLC; (5) Mehwash Munir; (6) One Stop Computer Services LLC; (7) Muhammad Zubair Khan; (8) Techtur Inc.; (9) Muhammad Mudassar Anwar; (10) Tech Drive Pvt LLC; (11) Ashhar Rawoof; (12) Smart Startup Solutions, LLC.; (13) Muhammad Usman Khan; (14) Yasir Agar; (15) Muhammad Shiraz Qureshi; and (16) Mavia Nizam, and their respective officers, directors, employees, agents, successors and assigns, and all others in active concert or participation with them, are permanently enjoined and restrained from:

1. Using counterfeit versions of any trademarks registered by Amazon (or its subsidiary, Amazon Technologies, Inc.) as of this injunction's entry date in conjunction with any advertising, marketing, offer for sale, promotion, display, publication, website, voicemail, email, or software;

2. Using any false designation of origin or false or misleading description or false or misleading representation that can or is likely to lead the trade or public or individuals

erroneously to believe that any website, social media page, voicemail, email, advertising, or other marketing material has been produced, distributed, displayed, licensed, sponsored, approved or authorized by or for Amazon, when such is not true in fact;

3. Engaging in any activity which is likely to falsely cause members of the trade and/or public to believe that any goods or services of Defendants are in any way endorsed by, approved by, affiliated with, and/or associated with Amazon, or any other activity constituting an infringement or dilution of any trademarks registered by Amazon (or its subsidiary, Amazon Technologies, Inc.);

4. Engaging in any activity that defrauds individuals into paying Defendants money for Amazon services or services purportedly related to Amazon services;

5. Registering or using any website domain names that use trademarks registered by Amazon (or its subsidiary, Amazon Technologies, Inc.) or are confusingly similar to trademarks registered by Amazon; and

6. Knowingly and materially assisting any other person or business entity in engaging in or performing any of the activities listed above.

#### **Transfer of Domain Names**

7. In order to give practical effect to the Permanent Injunction, the top level domain registry or their administrators shall, within thirty (30) days of receipt of this Order, transfer the below-listed domain names to Amazon, or change the registrar of record to a registrar of Amazon's choosing, and that registrar shall transfer the below-listed domain names to Amazon;

amazondigitalpublishing.com ("Website 6"),

amazondigitalpublisher.com ("Website 8"),

amazondigitalpublishers.com ("Website 9"),

amazonpublishingsol.com ("Website 10"),

amzdigitalpro.com ("Website 19"),

amazonkdpublishing.com ("Website 22"),

amazonkdppublication.com ("Website 23"), and

amazonprofessionalpublishers.com ("Website 25").

1 For all other domain names that are both 1) operated by the registrar accounts of the  
2 domain names listed in this Order, and 2) that also use the Amazon Marks or are confusingly  
3 similar to the Amazon Marks, the applicable top level domain registry or their administrators  
4 shall also transfer the domain names to Amazon, or change the registrar of record to a registrar of  
5 Amazon's choosing, and that registrar shall transfer the below-listed domain names to Amazon.

6 The Court retains jurisdiction to enforce this Judgment and Permanent Injunction.

7  
8 SO ORDERED.

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10 DATED: \_\_\_\_\_, 2024

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11 HONORABLE TRINA L. THOMPSON  
12 United States District Judge  
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